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Attorneys for Defendant
 FRONTIER AIRLINES, INC.

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

ANDREA RIDGELL, on behalf of herself and others similarly situated,) Case No.: 2:18-CV-04916 PA (AFMx)
Plaintiff,) STIPULATION AND ORDER TO
v.) CONTINUE SCHEDULING
FRONTIER AIRLINES, INC. a) CONFERENCE [PROPOSED]
Colorado corporation; AIRBUS) Current Date: October 1, 2018
S.A.S., a foreign corporation doing) Proposed New Date: October 15, 2018
business in the State of California;)
AIRBUS GROUP HQ, INC., a)
corporation doing business in the State)
of California,)
Defendants.)

Plaintiff Andrea Ridgell and defendant Frontier Airlines, Inc. (hereinafter "Frontier Airlines"), by and through their counsel of record, hereby submit their stipulation requesting that the Court continue the parties' scheduling conference, as follows.

WHEREAS, on August 16, 2018, the Court issued its Order setting the parties' scheduling conference for October 1, 2018 at 10:30 a.m. [Dkt No. 17];

STIPULATION AND ORDER TO CONTINUE
 SCHEDULING CONFERENCE [PROPOSED]

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1 WHEREAS, on August 28, 2018, plaintiff filed an *ex parte* application for relief
2 from deadline imposed by Local Rule 23-3 [Dkt No. 18];

3 WHEREAS, on August 29, 2018, Frontier filed its notice of non-opposition to
4 plaintiff's *ex parte* application for relief from deadline imposed by Local Rule 23-3
5 [Dkt No. 19];

6 WHEREAS, on August 29, 2018, the Court issued its Order denying plaintiff's *ex*
7 *parte* application [Dkt No. 20], pursuant to which the Court continued the deadline for
8 class certification from September 13, 2018 to October 22, 2018, ordered plaintiff to
9 file a properly noticed motion for relief from deadline and set the hearing for such
10 motion on October 15, 2018;

11 WHEREAS, on September 17, 2018, the parties filed their Joint Rule 26 Report
12 [Dkt No. 23], pursuant to which they agreed to propose staging the litigation in this
13 matter such that certain potentially dispositive motions are heard in advance of
14 plaintiff's motion for class certification; and

15 WHEREAS, the issues relating to plaintiff's motion for relief from deadline and
16 the parties' agreement to stage the litigation are interrelated and the parties believe it
17 would conserve time and judicial resources to address the parties' proposed discovery
18 plan and plaintiff's motion for relief from deadline simultaneously; and

19 WHEREAS, lead counsel for Frontier resides in New York, has now obtained his
20 certificate of good standing with respect to his admission to the New York State Bar
21 and will shortly file his application for admission to this Court *pro hac vice*; and

22 WHEREAS, lead counsel for Frontier intends to appear in person for the
23 scheduling conference and the hearing on plaintiff's motion for relief from deadline, to
24 the extent that the Court finds the *pro hac vice* application to be in order; and

25 WHEREAS, lead counsel for Frontier has a family obligation in New York on
26 the afternoon of Sunday, October 14th and would be traveling to Los Angeles on the
27 last available evening flight; and
28

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1 WHEREAS, lead counsel for Frontier is mindful of the possibility of a flight
2 delay or cancellation which may require him to travel on the morning of October 15th
3 and, thus, respectfully requests that the scheduling conference be set at the same time as
4 the hearing on plaintiff's motion, 1:30 p.m., in order to ensure that counsel arrives in
5 Los Angeles sufficiently prior to the parties' Court appearance;

6 IT IS HEREBY STIPULATED that good cause exists for the Court to continue
7 the scheduling conference to be held at the same time as the hearing on plaintiff's
8 motion for relief from deadline, and the parties, thus, respectfully request that the Court
9 continue the Scheduling Conference to be held at 1:30 p.m. on October 15, 2018.

10 IT IS SO STIPULATED.

11 Dated: September 21, 2018

CLYDE & CO US LLP

12 By: /s/ Natasha N. Mikha

13 KEVIN R. SUTHERLAND
14 NATASHA N. MIKHA
15 Attorneys for Defendant
FRONTIER AIRLINES, INC.

16 Dated: September 21, 2018

BRADLEY/GROMBACHER LLP

17 By: /s/ Kiley L. Grombacher

18 MARCUS J. BRADLEY
19 KILEY L. GROMBACHER
20 KRISTI D. ROTHSCHILD
21 Attorneys for Plaintiff
22 ANDREA RIDGELL
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PROOF OF SERVICE

**STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

I am employed in the County of Los Angeles, State of California, I am over the age of eighteen years, and not a party to the within action. My business address is 633 West 5th Street, 26th Floor, Los Angeles California 90071.

On September 21, 2018, I served the document(s) described as:

**STIPULATION AND ORDER [PROPOSED] TO CONTINUE
SCHEDULING CONFERENCE**

on the parties in this action addressed as follows:

SEE ATTACHED SERVICE LIST

in the following manner:

- ☐ **(BY FAX):** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below, or as stated on the attached service list, on this date before 5:00 p.m.
- ☐ **(BY MAIL):** as follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- ☐ **(BY OVERNIGHT DELIVERY):** I caused such envelope(s) to be delivered to an overnight delivery carrier with delivery fees provided for, addressed to the person(s) on whom it is to be served.
- ☐ **(BY PERSONAL SERVICE):** I caused such envelope(s) to be delivered by hand this date to the offices of the addressee(s).
- ☒ **(BY CM/ECF):** by electronic filing system with the clerk of the Court which will send a Notice of Electronic Filing to all parties with an e-mail address of record, who have filed a Notice of Consent to Electronic Service in this action:

I declare I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 21, 2018, at Los Angeles, California.

Kathy L. Rollins

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